

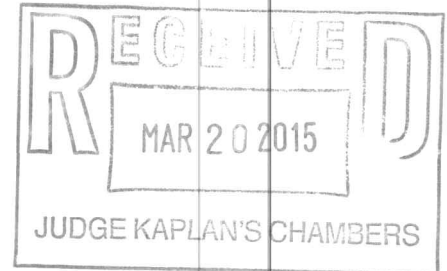
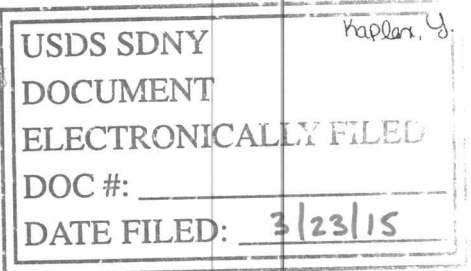
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re:

BANK OF NEW YORK MELLON CORP.
FOREX TRANSACTIONS LITIGATION

This Document Relates to: *The Securities Action*

No. 12-md-2335-LAK



**STIPULATION AND PROPOSED
ORDER REGARDING OUTSTANDING DEPOSITIONS**

WHEREAS on February 20, 2015, the Court issued an Order staying all discovery for 28 days (from February 17, 2015, until March 17, 2015), and extending by 28 days all pre-trial deadlines as set forth in the Amended Scheduling Order entered on July 11, 2014, as modified by the Stipulation and Order entered on January 21, 2015, such that fact discovery and expert discovery relating to class certification in this matter is currently set to close on March 27, 2015;

WHEREAS the parties to the above-captioned action (the "Securities Action") have been working to schedule outstanding depositions for dates between March 17 and March 27, 2015, and anticipate conducting numerous depositions during this period; and

WHEREAS four witnesses, including third-party witnesses State Street Global Advisors ("SSGA") and Capital Guardian, plaintiffs' expert witness S.P. Kothari, and BNYM corporate representative Maryann Watt,¹ whose depositions potentially will be taken in this action, are not available for deposition on dates between March 17 and March 27, 2015;

¹ BNYM and Plaintiffs have agreed to evaluate the need for Ms. Watt's deposition after service of BNYM's responses to Plaintiffs' interrogatories on March 24, 2015. The parties reserve all rights in this regard.

WHEREAS Capital Guardian, Dr. Kothari, Ms. Watt and SSGA expect to be available for deposition shortly after the close of fact discovery and expert discovery relating to class certification in this matter;

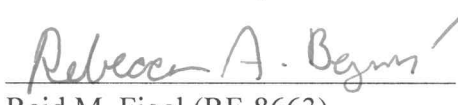
IT IS HEREBY STIPULATED AND AGREED, by and among the parties hereto, through their undersigned counsel, as follows:

For the convenience of the above-mentioned witnesses, the depositions of Capital Guardian, Dr. Kothari, Ms. Watt and SSGA may be conducted within a period of up to two weeks after the close of fact and class certification discovery in the above-captioned action.

STIPULATED AND AGREED:

Dated: March 20, 2015

**KELLOGG, HUBER, HANSEN, TODD,
EVANS & FIGEL, P.L.L.C.**

 *1506 w/ permission*

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*Lead Counsel for Lead Plaintiff the State of
Oregon by and through the Oregon State
Treasurer on behalf of the Common School
Fund and the Oregon Public Employee
Retirement Fund and the Class*

SO ORDERED.

Dated: 3/23, 2015

SO ORDERED


LEWIS A. KAPLAN, USDC